

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BONITA HEADLAM-CLARKSON,	:	
individually on behalf of herself	:	
and all others similarly	:	CIVIL NO.: 20-cv-04068
situated,	:	
	:	
Plaintiff,	:	
	:	
	:	
v.	:	
	:	
	:	
	:	
CIGNA CORPORATION,	:	
LIFE INSURANCE COMPANY	:	
OF NORTH AMERICA, CIGNA LIFE	:	
INSURANCE COMPANY OF NEW	:	
YORK, AND CONNECTICUT LIFE	:	
INSURANCE COMPANY,	:	
Defendants.	:	
	:	

**MOTION FOR THE ADMISSION
PRO HAC VICE OF RAINA C. BORRELLI**

I, Patrick Howard, Esquire, in accordance with Local Rule of Civil Procedure 83.5.2(b), hereby move the Court to admit Raina C. Borrelli, Esquire *pro hac vice* on behalf of Plaintiff in the above-captioned matter.

In support of this Motion, I state the following:

1. I am, and since the date of my admission in 2002, have remained a member in good standing of the Bar of the Commonwealth of Pennsylvania.
2. Saltz, Mongeluzzi & Bendesky, P.C. has been retained to represent Plaintiff, Bonita Headlam-Clarkson in this proceeding.
3. Haven spoken with my client on this matter, I represent to the Court that my client wishes for Raina C. Borrelli to participate as counsel in this proceeding.

4. Counsel for Defendant has no objection to this Motion.
5. Ms. Borrelli's Verification and Affidavit in Support thereof are attached hereto.

WHEREFORE, it is respectfully requested that the motion to admit Raina C. Borrelli,
Esq. *pro hac vice*, to represent Plaintiff in the above-captioned matter is granted.

Dated: October 8, 2020

/s/ Patrick Howard

Patrick Howard, Esq.

SALTZ, MONGELUZZI & BENDESKY, P.C.

1650 Market Street, 52nd Floor

Philadelphia, PA 19103

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Fax: (215) 496-0999

phoward@smbb.com

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CIGNA CORPORATION,	:	
LIFE INSURANCE COMPANY	:	
OF NORTH AMERICA, CIGNA LIFE	:	
INSURANCE COMPANY OF NEW	:	
YORK, AND CONNECTICUT LIFE	:	
INSURANCE COMPANY,	:	
Defendants.	:	
	:	

VERIFICATION OF RAINA C. BORRELLI

I, Raina C. Borrelli submit this verification in support of my Application for *Pro Hac Vice* Admission in the above-captioned matter:

1. I am a partner at the law firm of Gustafson Gluek PLLC, with a principal business address of 120 South Sixth Street, Suite 2600, Minneapolis, Minnesota 55402. My business telephone is (612) 333-8844.
2. I am a member in good standing of the bar of the State of Minnesota since 2011; Bar No. 392127.
3. There are no disciplinary proceedings pending against me by the bar of any jurisdiction in which I am licensed to practice, nor have any such proceedings ever been instituted against me.

4. I have read the most recent edition of the Pennsylvania Rules of Professional Conduct and the Local Rules of this Court and agree to be bound by both sets of Rules for the duration of the case.

5. If granted *pro hac vice* admission, I will in good faith continue to advise Patrick Howard of the current status of the case and all material developments therein.

6. I make this verification upon person knowledge. I affirm that the foregoing statements made by me are true to the best of my knowledge, information and belief. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: October 8, 2020

Raina Borrelli

Raina C. Borrelli

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Civil Action No# 20-04068

**APPLICATION FORM FOR THOSE ATTORNEYS SEEKING TO PRACTICE IN THIS COURT
PURSUANT TO LOCAL RULE OF CIVIL PROCEDURE 83.5.2(b)**

I. APPLICANT'S STATEMENT

Raina C. Borrelli

I, Raina C. Borrelli, the undersigned, am an attorney who is not currently admitted to either the bar of this court or the bar of the Supreme Court of Pennsylvania, and I hereby apply for admission to practice in this court pursuant to Local Rule of Civil Procedure 83.5.2(b), and am submitting a check, number credit card, for the \$40.00 admission fee.

A. I state that I am currently admitted to practice in the following state jurisdictions:

<u>Minnesota</u> (State where admitted)	<u>10/28/2011</u> (Admission date)	<u>392127</u> (Attorney Identification Number)
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<u></u> (State where admitted)	<u></u> (Admission date)	<u></u> (Attorney Identification Number)
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<u></u> (State where admitted)	<u></u> (Admission date)	<u></u> (Attorney Identification Number)
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B. I state that I am currently admitted to practice in the following federal jurisdictions:

<u>D. Minnesota</u> (Court where admitted)	<u>11/8/2011</u> (Admission date)	<u></u> (Attorney Identification Number)
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<u>D. Colorado</u> (Court where admitted)	<u>2/20/2020</u> (Admission date)	<u></u> (Attorney Identification Number)
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<u></u> (Court where admitted)	<u></u> (Admission date)	<u></u> (Attorney Identification Number)
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C. I state that I am at present a member of the aforesaid bars in good standing, and that I will demean myself as an attorney of this court uprightly and according to law, and that I will support and defend the Constitution of the United States.

I am entering my appearance for

Raina Borrelli

(Applicant's Signature)

10/01/2020

(Date)

Name of Applicant's Firm Gustafson Gluek PLLC

Address 120 South Sixth Street, Suite 2600, Minneapolis, MN 55402

Telephone Number (612) 333-8844

Email Address Rborrelli@gustafsongluek.com

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/01/2020
(Date)

Raina Borrelli

(Applicant's Signature)

II. SPONSOR'S STATEMENT, MOTION AND CERTIFICATE OF SERVICE

The undersigned member of the bar of the United States District Court for the Eastern District of Pennsylvania hereby moves for the admission of Raina C. Borrelli _____ to practice in said court pursuant to Local Rule of Civil Procedure 83.5.2(b), and certify that I know (or after reasonable inquiry believe) that the applicant is a member in good standing of the above- referenced state and federal courts and that the applicant's private and personal character is good. I certify that this application form was on this date mailed, with postage prepaid, to all interested counsel.

Patrick Howard

(Sponsor's Name)



3/4/2002

(Admission date)

88572

(Attorney
Identification No.)

SPONSOR'S OFFICE ADDRESS AND TELEPHONE NUMBER:

Saltz Mongeluzzi & Bendesky, PC

120 Gibraltar Rd., Suite 218, Horsham, PA 19044

(215) 575-3895

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

10/11/2020

(Date)



CERTIFICATE OF SERVICE

I declare under penalty of perjury that on October 8, 2020 the Motion for Pro Hac Vice Admission of Raina C. Borrelli, Esq., along with Verification and Application thereto, to practice in this court pursuant to Local Rule of Civil Procedure 83.5.2(b) and the relevant proposed Order, which if granted, would permit such practice in this Court was filed electronically with the Court and as such sent to all counsel of record via ECF notification.

/s/ Patrick Howard

Patrick Howard, Esq.